



UNITED STATES OF AMERICA : CRIMINAL NO. 18-cr-124

v.

YOLONDA DENISE THOMPSON, : DATE FILED : May 3, 2018
w/k/a "Qhama Al," :
ALBERT WILLIAM UPSHUR : VIOLATIONS :

: 18 U.S.C. § 371 (conspiracy to
defraud the United States -
1 count)
: 26 U.S.C. § 7206(2) (aiding and
assisting in the preparation
of false tax returns and other
documents - 8 counts)

Motion

Rule 110 Pretrial Conferences.

(a) In General. In appropriate cases, the Court will undertake to confer with the parties in pretrial conferences with a view to narrowing issues, stipulating facts, simplifying the presentation of evidence, or otherwise assisting in the preparation for trial or possible disposition of the case in whole or in part without trial.

Federal Rule 12 B which entitled "pre trial motion" - provide that any defense, objection or request which is capable of determination without trial of the general issues may be raised before trial by motion.

Five Categories Must be raised pre-trial

- (1) Defenses and Objections based on defect in the institution of the Prosecution; or
- (2) Defenses and Objections based on defect in the indictment of information

FDC# 76588066

By: Albert William Upshur
Prose Defendant